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Attorneys for Defendant
TEXAS EASTERN OVERSEAS, INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

AMERIPRIDE SERVICES INC.,

Plaintiffs,

vs.

VALLEY INDUSTRIAL SERVICES, INC.,
a former California corporation, et al.,

Defendants.

Case No. 2:00-cv-00113-MCE-EFB

**DEFENDANT TEXAS EASTERN
OVERSEAS, INC.'S REQUEST AND
ORDER TO SEAL DOCUMENTS**

Trial Date: October 17-19, 2016
Closing Argument: November 15, 2016

Judge: Hon. Morrison C. England, Jr.

1 Pursuant to Local Rule 141 and the Stipulation and Protective Order entered by
2 the Court on January 12, 2017, Defendant TEXAS EASTERN OVERSEAS, INC.
3 (“TEO”), by and through its respective counsel, respectfully submits this request for the
4 Court to enter an order sealing the documents listed below. Dkt. 1139.¹

5 The documents to be approved for filing under seal include: (1) Defendant Texas
6 Eastern Overseas, Inc.’s Post-Trial Brief Regarding the Method to Credit Plaintiff
7 AmeriPride Services Inc.’s (“AmeriPride”) Settlement for Response Costs; (2) the
8 Declaration of Erin Poppler in Support of Defendant Texas Eastern Overseas, Inc.’s
9 Post-Trial Brief Re the Method to Credit AmeriPride’s Settlement for Response Costs,
10 and Exhibit A thereto. The total number of pages to be sealed is twenty-three (23)
11 pages.

12 TEO requests that the documents be sealed indefinitely, unless the parties to this
13 Action agree otherwise or as ordered by the Court. The only persons permitted access
14 to the sealed documents, other than the Court and its personnel, will be those who have
15 been granted access by AmeriPride and have completed the “Acknowledgment And
16 Agreement To Be Bound,” attached as Exhibit A to the Stipulation and Protective Order,
17 Dkt. 1139.

18 The basis for sealing these documents is the confidential nature of the materials,
19 as set forth in the Stipulation and Protective Order, Dkt. 1139.

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28 ¹ “Dkt.” refers to the Court’s ECF Docket number for this action.

1 The Request and Proposed Order to Seal Documents, the accompanying Notice,
2 and all documents covered by the request are being served on all parties on the same
3 day as this notice.

4
5 Date: January 23, 2017

BASSI, EDLIN, HUIE & BLUM LLP

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7 By: /s/ ERIN K. POPPLER

8 FRED M. BLUM
9 ERIN K. POPPLER
10 VIVY D. DANG
11 Attorneys for Defendant
12 TEXAS EASTERN OVERSEAS, INC.

13 **ORDER**

14 Defendant Texas Eastern Overseas, Inc.'s request is GRANTED. The following
15 documents are approved for filing under seal: (1) Defendant Texas Eastern Overseas,
16 Inc.'s Post-Trial Brief Regarding the Method to Credit Plaintiff AmeriPride Services,
17 Inc.'s Settlement for Response Costs; (2) the Declaration of Erin Poppler in Support of
18 Defendant Texas Eastern Overseas, Inc.'s Post-Trial Brief Re the Method to Credit
19 Plaintiff AmeriPride Services, Inc.'s Settlement for Response Costs, and Exhibit A
20 thereto.

21 IT IS SO ORDERED.

22 Dated: January 26, 2017

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24 MORRISON C. ENGLAND, JR.
25 UNITED STATES DISTRICT JUDGE
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